

BCL Burton Copeland

Solicitors

51 Lincoln's Inn Fields, London, WC2A 3LZ
Telephone: +44 (0)20 7430 2277 Fax: +44 (0)20 7430 1101 DX: 37981 KINGSWAY www.burtoncopeland.co.uk

Detective Sergeant Dick Beadell
Room 1915
New Scotland Yard
Broadway
London
SW1H 0BG

Our reference: IRB/NG/LKP/02N00341
Your reference:
When calling please ask for: Ian Burton
Group facsimile:

31 August 2006

Dear DS Beadell

NEWSGROUP NEWSPAPERS LTD

I write further to your letter addressed to Natalie Greenaway of this firm, which is undated but received by fax at this office on 25 August 2006.

On behalf of my clients, Newsgroup Newspapers Ltd, I would wish to make it plain that in connection with the enquiries that you are presently conducting and which are referred to in the Application under the Schedule 1 of the Police and Criminal Evidence Act (PACE Application), a copy of which was enclosed with your fax transmission, that my clients intend to provide such material as you or your colleagues might reasonably require from them in connection with your enquiries.

In pursuance of my client's stated intention to assist, I did on 17 August 2006, forward a file of material relating to cash payments made to Glen Mulcaire, to Counsel instructed by the Police, Mr Louis Mably of 6 King's Bench Walk.

In the proposed "PACE Application", the Police seek *"all paid cheques, credit/debit slips, mandates, statements of accounts, inter-account and telegraphic transfers, any other vouchers in relation to the following financial accounts. Account numbers or payment to any other bank accounts held in the name of Glen Mulcaire, Nine Consultancy Ltd or Nine Consultancy UK Ltd and any cash payments made by or on behalf of News International or Newsgroup Newspapers to Glen Mulcaire from 1 January 2005 present"*. I now enclose a file labelled "Newsgroup International – Payments to Nine Consultancy Ltd". This file contains the requested information and in particular, includes:

- 1 A schedule that has been created from the records maintained of all payments to the accounts referred to in the PACE Application;
- 2 The appropriate BACS Telecom Acceptance Advice relating to payments to be included in the payment schedule;

IAN R. BURTON HARRY A. TRAVERS BRIAN SPIRO MARK HASLAM RICHARD SALLYBANKS
JANE GLASS ROBIN BOOTH RACHEL HUBBARD SAMANTHA J. MOORE
Consultants: CATHERINE M. MATHER KAREN A. PEACOCK

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- 3 The redacted payment schedule which highlights each payment to Nine Consultancy Ltd;
- 4 The appropriate copy invoice in respect of each payment included in the schedule referred to in 1 above.

The above constitutes all material requested in the PACE Application apart from "any cash payments made by or on behalf of News International or Newsgroup Newspapers to Glen Mulcaire. From 1 January 2005 present".

My clients understand that you believe that there may be further cash payments above and beyond those referred to in the material produced to Mr Mably on 17 August 2006 and in particular, it is understood that such further payments may have been made to Mr Mulcaire in a different name, including that of "Paul Williams".

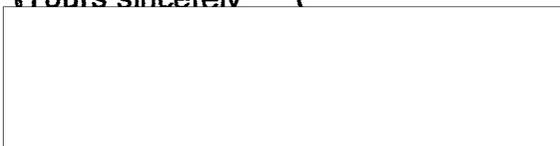
At this stage, it has not been possible for my clients to identify any such further payments from their records.

I would ask for your assistance in the provision of further information, to assist in ascertaining whether any such payments might have been made to Mr Mulcaire, either in the name Paul Williams or indeed any other name.

For the sake of completeness, I draw your attention to Tab 35 in the enclosed file. There is no BACS Telecom Acceptance Advice for this payment, owing to technical difficulties with the accounting system on 2 December 2005.

I look forward to hearing from you once you have had the opportunity of considering the material.

Yours sincerely



IAN R BURTON
BCL BURTON COPELAND

copy of letter delivered by hand 7⁰⁹/06

Your

Our reference:

Date: 7th September 2006



METROPOLITAN POLICE SERVICE

Mr Ian Burton
BCL Burton Copeland Solicitors,
51 Lincoln's Inn Fields,
London
WC2A 3LZ

SO13- Anti Terrorist Branch
New Scotland Yard
10 Broadway
London
SW1H 0BG

Telephone:
Facsimile: 0208 721 3751

Dear Ian Burton

During our meeting on Thursday 31st August 2006 where you indicated that your clients, Newsgroup Newspapers Ltd, are willing to provide material that is reasonably required to assist in the investigation of voicemail interception offences. I made the following requests for information;

- ❖ A copy of all documents relating to the contract for the employment Glen Mulcaire/Nine Consultancy Ltd.
- ❖ Any record of work completed in respect of Mr Mulcaire/Nine Consultancy. How is the return of work for Mr Mulcaire's weekly retainer confirmed?
- ❖ Who does Mr Mulcaire report to?
- ❖ Who does Mr Mulcaire work for? Has he completed work for other editors/journalists at News of the World? Can we have a copy of any other records for work completed by Mulcaire for these editors/journalists, including the subjects on whom he might have provided information.
- ❖ Details of the service providers for the telephone systems installed in the offices where Clive Goodman works.
- ❖ Details of a floor plan to include the locations of the telephone extensions in the office where Mr Goodman works.
- ❖ Details of the phones used regularly by Mr Clive Goodman (i.e. the number of the phone on his desk or any mobile issued to him by the company).
- ❖ Itemised billing for phones used regularly by Goodman (i.e. the phone on his desk and any other mobile phone issued to him) for the period of 1st December 2005 to 8th August 2006.

Whilst I anticipate there may be some initial reluctance to providing the itemised telephone data for calls from Mr Goodman's desk/office/mobile telephone for fear of providing access to journalistic material I would like to make the following comment. The investigation is attempting to identify all persons that may be involved including any fellow conspirators. Therefore we require the telephone numbers of persons called before and after relevant unlawful calls to the voice mailboxes. I am happy to discuss this further but believe this to be a proportional and necessary application.

Yours sincerely,

and the + work consultancy
Mark Street + Stephen A. H.

Mark Maberly
Detective Sergeant

Sample cards - 12/05
+ work
+ Steve
+ conduct in his desk

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DS Mark Maberly
Metropolitan Police Service
SO13 – Anti Terrorist Branch
New Scotland Yard
10 Broadway
London
SW1H 0BG

Our reference:

IRB/NG/ajw/N341

Your reference:

When calling please
ask for:

Ian Burton
Natalie Greenaway
020 7430 2277

Group facsimile:

8th September 2006

Dear DS Maberly

Re: Newsgroup Newspapers Ltd

Many thanks for your letter of 7th September 2006.

Ian is away from the office until Monday 11th September and will contact you upon his return to discuss your requests as set out in the letter referred to above.

Yours sincerely


Natalie Greenaway
BCL Burton Copeland

IAN R. BURTON HARRY A. TRAVERS BRIAN SPIRO MARK HASLAM RICHARD SALLYBANKS
JANE GLASS ROBIN BOOTH RACHEL HUBBARD SAMANTHA J. MOORE
Consultants: CATHERINE M. MATHER KAREN A. PEACOCK

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Solicitors

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Telephone: +44 (0)20 7430 2277 Fax: +44 (0)20 7430 1101 DX: 37981 KINGSWAY www.burtoncopeland.co.uk

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London
SW1H 0BG

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When calling please ask for: Ian Burton
Natalie Greenaway
Group facsimile: 020 7430 2277

14th September 2006

Dear DS Maberly

Re: Newsgroup Newspapers Ltd

Further to your letter of 7th September 2006, we have now had an opportunity to take full instructions in relation to the material held by Newsgroup Newspapers Limited.

Newsgroup Newspapers are anxious to provide all material reasonably required in respect of your investigation into voicemail interception offences. We stress, however, that the procedure under Part 2 of the 1984 Act is a procedure designed to produce documentation or other material in the possession of an individual. It is not a procedure designed to elicit answers other than those contained within such material.

In fact, very little documentary or other material in relation to Mr Mulcaire, Nine Consultancy Limited or Mr Goodman exists. This is entirely consistent with normal business practices in relation to the use of such consultants.

Attached to this letter are copies of all documents held by Newsgroup Newspapers falling within the terms of your request. This comprises copy documentation relating to the contract of employment between Nine Consultancy Limited and the News of the World. Extensive searches have revealed the existence of only one piece of paper, enclosed herewith.

No documents exist recording any work completed by Mr Mulcaire, monitoring of Mr Mulcaire's return of work, reporting structures or any persons for whom Mr Mulcaire may have provided information. There is no floor plan. The telephone system installed at Newsgroup Newspapers does not provide an itemised breakdown in respect of any particular extension number. We understand that you are in possession of Mr Goodman's mobile phone number and indeed the extension

IAN R. BURTON HARRY A. TRAVERS BRIAN SPIRO MARK HASLAM RICHARD SALLYBANKS
JANE GLASS ROBIN BOOTH RACHEL HUBBARD SAMANTHA J. MOORE ONDOCS01/NGREENAWAY/250481
Consultants: CATHERINE M. MATHER KAREN A. PEACOCK

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number of his desk, and are therefore in possession of the information you would require to make enquiries of the relevant service provider.

In this regard, we stress that itemised telephone records for both landlines and mobile phones will most certainly include confidential journalistic material. We would be anxious to ensure that if any application is made of the service provider that care is taken to ensure that only the redacted parts of such billing as relate to your investigation are provided. We note with concern your assertion that you seek the telephone numbers of persons called before and after relevant "unlawful" calls. It is highly likely that such information will amount to confidential journalistic material.

Newsgroup Newspapers wishes fully to assist your investigation and does not require any formal Court Order for the provision of any material. They are, however, entirely satisfied that the material to which you are entitled is limited and that you are now, along with material previously submitted, in possession of all relevant documentation. Should you have any residual concerns, we would be only too happy to discuss these matters either with yourself or, if you thought it of more assistance, in a meeting at which both your and our Counsel could be present. We hope, however, that this careful response will satisfy you that you now are in possession of all relevant material to which you are entitled.

Yours sincerely,


BCL Burton Copeland

Copy of letter delivered
by hand 15⁶⁹/06.

Your

Our reference:

Date: 14h September 2006



METROPOLITAN POLICE SERVICE

SO13- Anti Terrorist Branch
New Scotland Yard
10 Broadway
London
SW1H 0BG

Facsimile: 0208 721 3751

Mr Ian Burton
BCL Burton Copeland Solicitors,
51 Lincoln's Inn Fields,
London
WC2A 3LZ

Dear Ian Burton

Further to my earlier letter dated 7th September I wish to make the following requests for information held by your clients Newsgroup Newspapers Ltd.

During the search of Mr Goodman's offices at News International he identified the computer used by him (situated on his desk) and a safe also used by him (situated under his desk). These items were not seized or searched but were subject to a retention request. In relation to these two items I would like to be provided with a copy of information held on computer (including any mainframe database accessed from the desktop computer) and any information held in the safe that relates to the following;

- Material relating to any mobile telephone numbers that may connected to the interception of voicemail accounts (e.g. written notes, data files, cassette/digital recordings etc) by Mr Clive Goodman, Mr Glenn Mulcaire, Mr Paul Williams and Mr Stephen Mills.
- Material relating to any voicemail(s) that may have been listened to (e.g. written notes, data files, cassette/digital recordings etc) by Mr Clive Goodman, Mr Glenn Mulcaire, Mr Paul Williams and Mr Stephen Mills.
- Evidence of contact between Mr Clive Goodman, Mr Glenn Mulcaire, Mr Paul Williams, Nine Consultancy, Mr Stephen Mills and any others (whether directly or indirectly employed by News International) relating to the interception of voicemail(s).

In addition I would like to request copies of any material held by the Newsgroup Newspapers Ltd that relates to:

- The employment (directly or indirectly) of a Mr Stephen Mills (address - [redacted]), payments to Stephen Mills/Nine PR and News Consultancy/Nine News and PR Ltd.
- The employment of a Ms Jane Street ([redacted]) payments to Ms Jane Street/Nine PR and News Consultancy/Nine Consultancy Ltd.
- Details of swipe card access/exit at News of the World (News International premises at Wapping) for Mr Clive Goodman, Mr Glenn Mulcaire, Mr Paul Williams, Mr Stephen Mills and Jane Street between 01/12/05 and 15/08/06.

To assist with identifying the source of the information required and the individuals concerned I have included a sample of the exhibits seized that include a reference to them.

Yours sincerely,



Mark Maberly
Detective Sergeant

Appendix to exhibits attached

[REDACTED]

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Metropolitan Police Service
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When calling please ask for: Ian Burton
Natalie Greenaway
Group facsimile:

21 September 2006

Dear DS Maberly

Re: Newsgroup Newspapers Ltd

I refer to our letter of 14 September 2006 and your letter to us also of 14 September 2006 exchanged by hand at these offices.

We have, of course, since spoken (Burton/Maberly 18 September 2006; Greenaway/Maberly 19 September 2006) It is our understanding that you are presently only concerned to receive responses in relation to the following requests which, for the sake of convenience, we repeat as set out in your letter:

1. The employment (directly or indirectly) of a Mr Stephen Mills () payments to Stephen Mills/Nine PR and News Consultancy/Nine News and PR Ltd.
2. The employment of a Ms Jane Street () payments to Ms Jane Street/Nine PR and News Consultancy/Nine Consultancy Ltd.
3. Details of swipe card access/exit at News of the World (News International premises at Wapping) for Mr Clive Goodman, Mr Glenn Mulcaire, Mr Paul Williams, Mr Stephen Mills and Jane Street between 01/12/05 and 15/08/06.

In response to item 1, please note that no documents exist relating to the employment, directly or indirectly, of Stephen Mills, nor do any documents exist in respect of any payments to Stephen Mills either in his own name or for his attention at Nine PR, News Consultancy, Nine News or PR Ltd.

IAN R. BURTON HARRY A. TRAVERS BRIAN SPIRO MARK HASLAM RICHARD SALLYBANKS
JANE GLASS ROBIN BOOTH RACHEL HUBBARD SAMANTHA J. MOORE
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In relation to item 2, no documents exist regarding the employment of Jane Street and the only documents bearing any reference to Jane Street as identified by you in your letter or at all are contained in the invoice, a copy of which you provided in your letter of 14 September 2006, and in the enclosed computer generated payment record for Jane Street

In relation to item 3, the swipe card system used at News of the World is for employees only and as such does not record the entry of non-employees. There are, therefore, no entries in respect of Glenn Mulcaire, Paul Williams, Stephen Mills or Jane Street.

So far as records of Clive Goodman's access and exit from his place of employment are concerned, the system permits the maintenance of such records for only 28 days. Accordingly, there are no records that would detail Clive Goodman's access to and exit from News International's premises at Wapping during the period to which you refer.

We trust we have correctly understood the position in relation to your requests and have dealt with them above.

Please do not hesitate to contact either myself or Natalie should you require further assistance with this matter.


Ián Burton
BCL Burton Copeland

Enc.

BCL Burton Copeland

Solicitors

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Ian Burton
Natalie Greenaway

21 September 2006

Dear DS Maberly

Re: Newsgroup Newspapers Ltd

Following our telephone conversation earlier today, you informed me that you would prefer to collect this letter from our offices on Monday 25 September 2006.

I look forward to hearing from you in due course.

Yours sincerely


Natalie Greenaway
BCL Burton Copeland

Enc.

IAN R. BURTON HARRY A. TRAVERS JANE GLASS MARK HASLAM BRIAN SPIRO
ROBIN BOOTH RICHARD SALLYBANKS RACHEL HUBBARD SAMANTHA J. MCDONNELL

Consultants: CATHERINE M. MATHER KAREN A. PEACOCK

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